



Department of Health

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October 26, 2015

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

ATTN: Nathaniel J. Davis, Sr., Deputy Secretary

RE: Fields Point Liquefaction Project, Docket PF15-28-000

The Rhode Island Department of Health (RIDOH) is responding with this letter to the Request for Comments on Environmental Issues, published by the Federal Energy Regulatory Commission (FERC) on September 25, 2015, with respect to Docket No. PF15-28-000 for National Grid LNG, LLC's proposed Fields Point Liquefaction Project. RIDOH requests to be deemed a cooperating agency, with all the rights and opportunities to participate in FERC's review of this project preserved thereby.

RIDOH recommends FERC conduct a robust review of the project that fully incorporates public health perspectives and reviews potential public health concerns.

The Request for Comments specifies many topic headings to be covered in the environmental document, including but not limited to: land use; water resources; cultural resources; air quality and noise; socioeconomics; public safety; and cumulative impacts. All of these areas of subject-matter review affect population health outcomes. For this reason RIDOH recommends including a Health Impact Assessment as a component of the environmental review, which is within the scope of National Environmental Policy Act regulations and would result in a more thorough review of the project, one commensurate with protecting the public's health.

The following comments outline a broad scope of the potential public health concerns that should be included within the Health Impact Assessment, as well as some specific recommendations on topics related to health security. With respect to overall health security, the proposed project's impact on the surrounding community's ability to reduce hazard vulnerability, correct place-based inequities influencing health, increase sustainability within the local area, and improve the collective resiliency of residents should be assessed and included for review.

As Director, my strategic priorities for RIDOH are to address the social and environmental determinants of health, to eliminate health disparities in Rhode Island by promoting health equity, and to ensure access to quality services, especially for vulnerable populations. Public health's data-driven approach may offer valuable insight to identify areas of concern and analyze the ways in which underlying social and environmental determinants of health impact disparities in health outcomes and overall population health. RIDOH recommends that this approach, which would utilize and analyze relevant public health data, be applied to reviewing the cumulative impacts of the proposed project.

From a place-based public health perspective, cumulative impacts and public safety impacts should be assessed at multiple levels, from close proximity (0.5, 1 and 2 mile radius from the facility), to neighborhood level and citywide level of analysis. There are a number of underlying factors (i.e., geographic, socioeconomic, and environmental) that should be included in assessments of cumulative impacts. Health protection alongside the prevention of disease should be included within this portion of the review.

Geographically, the proposed facility is in an industrial area with a concentration of facilities listed in the EPA's Toxic Release Inventory (TRI), facilities requiring Risk Management Plans (RMP), and Treatment, Storage, and Disposal Facilities (TSDF) that handle hazardous materials. According to EPA data accessed through the EJSCREEN tool, the 1 mile radius from the proposed facility is in the 97th percentile in the state, the 98th percentile in the region, and the 95th percentile nationally for proximity to RMP facilities. For TSDF Proximity, the 1 mile buffer is in the 98th percentile for the state, 99th percentile for the region, and 99th percentile nationally.

Another geographic factor that is critical for analysis in the environmental review is the concentration of healthcare facilities and critical health system infrastructure within close proximity to the proposed project. Rhode Island's only Level 1 Trauma Center is located in the Rhode Island Hospital complex, which includes Hasbro Children's Hospital and is adjacent to Women and Infants Hospital. There are many additional primary care, specialty care, pediatric healthcare, and Federally Qualified Health Centers within this area of interest at varying degrees of proximity to the site location of the proposed facility. Providence Community Health Center's administrative building and Chaffee Health Center are within the half mile radius parcel map produced by AECOM for the pre-application materials. RIDOH recommends that careful attention be paid to any potential impacts to this critical healthcare infrastructure, including both for the cumulative impacts of construction and normal operation of the facility, and for any potential increased risk for accidents or emergency situations. Inclusion of public health analysis for emergency preparedness and response is further detailed in the health security comments below.

Socioeconomically, the one mile buffer around the proposed facility is 75% minority population, which compared to the statewide average of 24% places the area in the 91st percentile, and compared to the regional average of 21% is in the 93rd percentile. It is 56% low-income (85th percentile for the state), 17% linguistically isolated (88th percentile for the state), and 31% have less than high school education (86th percentile for state). The combined socioeconomics for the neighborhoods of Upper and Lower South Providence and Washington Park are 82% minority population (93rd percentile for the state), 64% low-income (91st percentile for the state), 24% linguistically isolated (92nd percentile for the state), and 33% have less than high school education (87th percentile for state).

These socioeconomic statistics are of important public health interest as significant social determinants of health. RIDOH has ample data on poor health outcomes, elevated health risks, and racial and ethnic health disparities within the City of Providence and in particular within the neighborhoods of Upper and Lower South Providence and Washington Park, which are in closest proximity to the proposed project. RIDOH's 2014 Asthma Claims Data Report used health insurance claims data to produce detailed hot spot maps for asthma prevalence, emergency department visits, and hospitalizations, which all show asthma hot spots and elevated asthma risk in this focus area, at some of the highest levels in the state. Providence has the highest asthma-related pediatric hospitalization rates in the state, and asthma is elevated in low-income individuals and Black/African American and Hispanic/Latino communities.

RIDOH is funding 11 Rhode Island non-profit organizations and local governments at various levels to support innovative approaches to improving health outcomes. The Department of Health and these grantees have created Health Equity Zones – defined geographic areas where high rates of obesity, illness, injury, chronic disease or other adverse health outcomes will be improved by coordinated strategies to reduce and manage chronic diseases, promote healthy lifestyles, improve birth outcomes, assure healthy child development, and create environments where healthy choices are easier to make. It is

the vision of the Department of Health, that communities are engaged in democracy and committed to equality and diversity. Through these Health Equity Zones we will create and maintain sustainable and healthy places for all Rhode Islanders to live, work, and learn. It is imperative that alterations to the community's landscape by other sectors does not impede the progress being achieved by such initiatives.

Given the high level of existing health burdens in areas adjacent to the proposed facility, RIDOH requests that the scope of the cumulative impact analysis include any additional impact related to air quality, emissions, and/or traffic due to construction or operation of the facility. As cited in the Resource Report 1 submitted by National Grid to FERC (Section 1.9 Cumulative Impact Analysis), the regulations for the implementation of NEPA (40 CFR, Section 1508.7),

“Although the individual impact of one project may be minor for one or more resources, the additive or synergistic effects of multiple projects could be significant. Cumulative impacts associated with the proposed Project could result from the combined direct and indirect impacts of construction and operation of the Project facilities with other past, present, or reasonably foreseeable planned projects that overlap with the geographic scope and timeframe of the proposed Project.”

RIDOH supports implementing an in-depth cumulative impact analysis, and will work to provide relevant available data upon request for a cumulative impact review that takes into account existing air quality and health data. RIDOH is also collaborating with RI Department of Environmental Management (RIDEM) on an EPA-funded air quality monitoring project that will be analyzing the health impacts of highway traffic from I-95 in asthma hot spots, particularly in the Thurbers Ave area. The project will be measuring VOCs, ultrafine particles, and black carbon with stationary and mobile devices, and will be collecting air quality data that is currently not available through the existing air quality monitoring network. Other environmental factors that are worth considering in the scope of the review include coastal flooding, both current and future levels given projected sea level rise, as well as potential storm surge and wind impacts. The effects of climate change on this project and therefore long-term population health is a necessary, additional component of the current environmental review. RIDOH recommends using Rhode Island's state-developed STORMTOOLS projections, available on ARCGIS.

The final set of topics that RIDOH requests be included in the environmental review fall under the general heading of “public safety,” of which RIDOH has purview from the perspective of assuring health security within the context of community health resiliency. Health security involves looking at issues of achieving and assuring health equity in a community before, during, and after any potential emergency. Health security is a state in which a community and its people are prepared for, protected from, and resilient in the face of incidents with health consequences. This applies to the introduction of a new facility and the risk posed by the various topics covered within this letter.

Although the possibility of an emergency or disaster may be low, the combination of multiple hazardous facilities, healthcare infrastructure, and vulnerable communities requires extra care and attention. Potential hazards may include leaks, fires, floods, earthquakes, hurricanes, storm surge, equipment malfunction, accident, terrorism, and the added risk of secondary offsite incidents including chemical incidents or explosions from co-located facilities requiring chemical risk management plans. RIDOH is concerned about the health impacts that would result from a worst-case scenario involving secondary impacts, which might involve amplified chemical reactions with substances such as chlorine, ammonium, and heat from flammable materials stored in co-located facilities. The close proximity to the I-95 highway corridor, and Rhode Island's level 1 trauma center present an additional risk to the critical infrastructure needed for responding to any potential disaster situation. With a medically-vulnerable population and a relatively high percentage of people who are linguistically-isolated in the adjacent community, considerations around communications in disaster preparedness and response should also be taken into consideration as part of the environmental assessment and/or a broader emergency/risk management review.

Given the set of potential risk scenarios, RIDOH requests that FERC consider requiring a Risk Management Plan for both the proposed liquefaction facility as well as the existing LNG storage facility, which does not currently have a Risk Management Plan. Ideally, this Risk Management Plan should include a full and comprehensive Process Hazard Analysis, and take into consideration the potential scenarios of secondary incidents at neighboring facilities. A detailed analysis of this nature would be immensely valuable for ensuring the protection of our critical healthcare infrastructure and safety of vulnerable populations.

The scoping recommendations presented in these comments were developed by a cross-departmental committee that involved multiple Divisions, Centers, and Programs within RIDOH. RIDOH looks forward to working collaboratively with FERC, with other state agencies, and with all interested parties to ensure a thorough and constructive review of the proposed project in accordance to all applicable state and federal regulations.

Thank you for your attention to this correspondence.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicole Alexander-Scott", with a stylized flourish at the end.

Dr. Nicole Alexander-Scott, MD, M.P.H.
Director of Health
Rhode Island Department of Health